

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

Civil Action No. 12-cv-00487-MOC-DSC

DAVID HOLMES, HERTA S. THEBERGE,
MARGUERITE K. POTTER, and the
MARGUERITE K. POTTER REVOCABLE
TRUST, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BANK OF AMERICA, N.A., in its own
capacity and as successor by merger to BAC
Home Loans Servicing, L.P., SEATTLE
SPECIALTY INSURANCE SERVICES,
INC., in its own capacity and as successor in
interest to COUNTRYWIDE INSURANCE
SERVICES, INC., ILLINOIS UNION
INSURANCE COMPANY, and CERTAIN
UNDERWRITERS AT LLOYD'S LONDON,
including all underwriters who underwrote
force-placed wind insurance policies for Bank
of America, as the insured during the
applicable limitations period and LLOYD'S
UNDERWRITERS AT LONDON,

Defendants.

JOINT MOTION FOR EXTENSION OF CASE DEADLINES

Plaintiffs David Holmes, Herta Theberge, Marguerite K. Potter and the Marguerite K. Potter Revocable Trust, ("Plaintiffs") and Defendants Bank of America, N.A., Seattle Specialty Insurance Services, Inc., Illinois Union Insurance Co., and the Defendants named as "Certain Underwriters at Lloyd's, London including all underwriters at Lloyd's London who underwrote force-placed wind insurance policies for Bank of America as the insured during the applicable statute of limitations period" ("Defendants") (collectively, the "Parties") hereby jointly move the

Court for an order extending the current deadlines in this action as set out in the chart below. In support of this Motion, the Parties state that they require additional time to conduct discovery in this matter in preparation for class certification and seek to extend the current deadlines in this case accordingly as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Class Certification Motion	February 28, 2014	June 26, 2014
Defendants' Response to Class Certification	April 15, 2014	August 7, 2014
Plaintiffs' Reply	May 15, 2014	September 4, 2014
Fact Discovery Completion	March 31, 2014	October 3, 2014
Expert Reports (Plaintiffs)	February 28, 2014	June 26, 2014
Expert Reports (Defendants)	April 15, 2014	August 7, 2014
Expert Discovery Completion	April 30, 2014	August 14, 2014
Mediation	May 30, 2014	March 31, 2014
Dispositive Motions	June 30, 2014	October 30, 2014
Trial	October 6, 2014	February 2, 2015

Respectfully submitted,

Dated: January 22, 2014

/s/Joseph C. Hashmall

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*Attorneys for Defendants Named as "Certain
Underwriters at Lloyd's, London including all
underwriters at Lloyd's London who underwrote
force-placed wind insurance policies for Bank of
America as the insured during the applicable
statute of limitations period"*

CERTIFICATE OF SERVICE

I, Joseph C. Hashmall, certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 22, 2014.

Dated: January 22, 2014

/s/Joseph C. Hashmall
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